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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

JOHN HARLEY CRANE,)	Case No.: 1:23-cv-01289-NODJ-GSA
)	
Plaintiff,)	STIPULATION FOR AN EXTENSION OF
)	TIME; ORDER
vs.)	
)	
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's motion for summary judgment be extended thirty (30) days from February 28, 2024, up to and including March 29, 2024. This is the parties' second stipulation for an extension of the Court's Scheduling Order, and Defendant's first extension.

This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant, along with another brief, both of which are due on February 28, 2024. Moreover, counsel already has another brief due that same day and eight briefs before the end of March. Thus, Defendant requires an extension

1 in this case, and may require extensions in other cases, and requests this extension in good faith
2 and with no intent to delay these proceedings unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

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6 Respectfully submitted,

7 Dated: February 7, 2024

/s/ Jonathan Omar Pena*

JONATHAN OMAR PENA

Attorney for Plaintiff

**as authorized via e-mail on February 7, 2024*

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11 Dated: February 7, 2024

PHILLIP TALBERT

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MATHEW W. PILE

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15 By: /s/ Mary Tsai

MARY TSAI

Special Assistant U.S. Attorney

Attorneys for Defendant

18
19 **ORDER**

20 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
21 extension, up to and including March 29, 2024 to respond to Plaintiff's motion for summary
22 judgment.

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24 IT IS SO ORDERED.

25 Dated: **February 8, 2024**

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE

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